

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUONG HOANG,

Plaintiff,

v.

AMAZON.COM, INC., a Delaware  
corporation, and IMDB.COM, INC., a  
Delaware corporation,

Defendants.

No. 2:11-CV-01709-MJP

**DECLARATION OF BREENA M. ROOS  
IN SUPPORT OF IMDb.COM, INC.'S  
MOTION FOR SUMMARY JUDGMENT  
AND AMAZON.COM, INC.'S MOTION  
FOR SUMMARY JUDGMENT**

I, Breena M. Roos, hereby declare as follows:

1. I am an associate at Perkins Coie LLP. I am one of the attorneys representing defendants Amazon.com, Inc. and IMDb.com, Inc. ("Defendants") in the above-referenced matter. I make this declaration based on personal knowledge and review of records and correspondence relating to the above-referenced matter.

2. Attached hereto as Exhibit A is a true and correct copy of portions of the transcript of the deposition of Huong Hoang ("Hoang") taken on July 26, 2012 in the above-captioned matter ("Hoang Dep., Vol. I"). Relevant portions of the transcript have been highlighted in grey. Further, the transcript has been redacted in accordance with CR 5.1. Portions of the transcript that have been designated by Hoang as Confidential or Highly Confidential—

Attorneys' Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, have been redacted from the publicly-filed version of this declaration. A non-redacted version is being filed under seal.

3. Attached hereto as Exhibit B is a true and correct copy of portions of Exhibit 1 to the Hoang Dep., Vol. I (Plaintiff's Third Supplemental Objections and Responses to Defendants' Interrogatories and Requests for Production to Plaintiff). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

4. Attached hereto as Exhibit C is a true and correct copy of Exhibit 2 to the Hoang Dep., Vol. I (a screenshot of the IMDbPro.com Main Details page for Junie Hoang). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

5. Attached hereto as Exhibit D is a true and correct copy of Exhibit 7 to the Hoang Dep., Vol. I (IMDbPro Subscriber Agreement, last updated May 18, 2012, Bates numbered IMDb 001094-1097).

6. Attached hereto as Exhibit E is a true and correct copy of Exhibit 9 to the Hoang Dep., Vol. I (the cover page of Ms. Hoang's United States passport and the front of Ms. Hoang's driver's license for the state of Texas, Bates numbered HOANG 00065). This document has been designated by Hoang as Highly Confidential—Attorneys' Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

7. Attached hereto as Exhibit F is a true and correct copy of Exhibit 10 to the Hoang Dep., Vol. I (a redacted copy of Hoang's birth certificate, Bates numbered HOANG 000064). This document has been designated by Hoang as Highly Confidential—Attorneys' Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

8. Attached hereto as Exhibit G is a true and correct copy of Exhibit 11 to the Hoang Dep., Vol. I (Bates numbered IMDb 001291-93). This document has been designated by Hoang

1 as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being  
2  
3 filed under seal.

4  
5 9. Attached hereto as Exhibit H is a true and correct copy of Exhibit 12 to the Hoang  
6  
7 Dep., Vol. I (Bates numbered IMDb 001037). This document has been designated by Hoang as  
8  
9 Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed  
10  
11 under seal.

12  
13 10. Attached hereto as Exhibit I is a true and correct copy of Exhibit 13 to the Hoang  
14  
15 Dep., Vol. I (Bates numbered IMDb 001675-76). This document has been designated by Hoang  
16  
17 as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being  
18  
19 filed under seal.

20  
21 11. Attached hereto as Exhibit J is a true and correct copy of Exhibit 14 to the Hoang  
22  
23 Dep., Vol. I (Bates numbered IMDb 001375). This document has been designated by Hoang as  
24  
25 Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed  
26  
27 under seal.

28  
29 12. Attached hereto as Exhibit K is a true and correct copy of Exhibit 15 to the Hoang  
30  
31 Dep., Vol. I (Bates numbered IMDb 001373). This document has been designated by Hoang as  
32  
33 Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed  
34  
35 under seal.

36  
37 13. Attached hereto as Exhibit L is a true and correct copy of Exhibit 16 to the Hoang  
38  
39 Dep., Vol. I (Bates numbered IMDb 001356-57). This document has been designated by Hoang  
40  
41 as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being  
42  
43 filed under seal.

44  
45 14. Attached hereto as Exhibit M is a true and correct copy of Exhibit 18 to the  
46  
47 Hoang Dep., Vol. I (Bates numbered IMDb 000960). This document has been designated by  
48  
49 Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is  
50  
51 being filed under seal.

1           15. Attached hereto as Exhibit N is a true and correct copy of Exhibit 19 to the Hoang  
2 Dep., Vol. I (the envelope and enclosed correspondence, Bates numbered IMDb 001051-52).

3 This document has been designated by Hoang as Highly Confidential—Attorneys’ Eyes Only  
4  
5 pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.  
6  
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8           16. Attached hereto as Exhibit O is a true and correct copy of Exhibit 20 to the Hoang  
9 Dep., Vol. I (Bates numbered IMDb 000961). This document has been designated by Hoang as  
10 Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed  
11 under seal.  
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15           17. Attached hereto as Exhibit P is a true and correct copy of Exhibit 21 to the Hoang  
16 Dep., Vol. I (a letter from Ms. Hoang to IMDb enclosing correspondence from Ms. Hoang’s  
17 attorney, Jalene Mack, both dated July 11, 2008, Bates numbered IMDb 001050-51). This  
18 document has been designated by Hoang as Confidential pursuant to the Stipulated Protective  
19 Order, Dkt. No. 58, and therefore is being filed under seal.  
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26           18. Attached hereto as Exhibit Q is a true and correct copy of Exhibit 22 to the Hoang  
27 Dep., Vol. I (correspondence from Jenny Bosby dated June 20, 2011, Bates numbered HOANG  
28 000003). This document has been designated by Hoang as Confidential pursuant to the  
29 Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.  
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35           19. Attached hereto as Exhibit R is a true and correct copy of Exhibit 23 to the Hoang  
36 Dep., Vol. I (Bates numbered IMDb 000984). This document has been designated by Hoang as  
37 Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed  
38 under seal.  
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42           20. Attached hereto as Exhibit S is a true and correct copy of Exhibit 24 to the Hoang  
43 Dep., Vol. I (Bates numbered IMDb 000985). This document has been designated by Hoang as  
44 Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed  
45 under seal.  
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21. Attached hereto as Exhibit T is a true and correct copy of Exhibit 25 to the Hoang Dep., Vol. I (correspondence Bates numbered IMDb 001032-33). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

22. Attached hereto as Exhibit U is a true and correct copy of Exhibit 26 to the Hoang Dep., Vol. I (Bates numbered IMDb 001289). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

23. Attached hereto as Exhibit V is a true and correct copy of Exhibit 27 to the Hoang Dep., Vol. I (Bates numbered IMDb 00986). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

24. Attached hereto as Exhibit W is a true and correct copy of Exhibit 28 to the Hoang Dep., Vol. I (Bates numbered IMDb 001288). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

25. Attached hereto as Exhibit X is a true and correct copy of Exhibit 29 to the Hoang Dep., Vol. I (Bates numbered IMDb 000963). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

26. Attached hereto as Exhibit Y is a true and correct copy of Exhibit 30 to the Hoang Dep., Vol. I (Bates numbered IMDb 001283-84). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

27. Attached hereto as Exhibit Z is a true and correct copy of Exhibit 31 to the Hoang Dep., Vol. I (a non-government issued identification for the state of Texas with the name

1 “Hoang, Junie,” Bates numbered HOANG 000070). This document has been designated by  
2  
3 Hoang as Highly Confidential—Attorneys’ Eyes Only pursuant to the Stipulated Protective  
4  
5 Order, Dkt. No. 58, and therefore is being filed under seal.

6  
7 28. Attached hereto as Exhibit AA is a true and correct copy of Exhibit 32 to the  
8  
9 Hoang Dep., Vol. I (a copy of a purported United States passport with the name “Phong Junie  
10  
11 Hoang”). This document has been designated by Hoang as Highly Confidential—Attorneys’  
12  
13 Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed  
14  
15 under seal.

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17 29. Attached hereto as Exhibit BB is a true and correct copy of Exhibit 33 to the  
18  
19 Hoang Dep., Vol. I (Bates numbered IMDb 001281-82). This document has been designated by  
20  
21 Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is  
22  
23 being filed under seal.

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25 30. Attached hereto as Exhibit CC is a true and correct copy of Exhibit 34 to the  
26  
27 Hoang Dep., Vol. I (Bates numbered IMDb 001035-36). This document has been designated by  
28  
29 Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is  
30  
31 being filed under seal.

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33 31. Attached hereto as Exhibit DD is a true and correct copy of Exhibit 35 to the  
34  
35 Hoang Dep., Vol. I (Bates numbered IMDb 001270). This document has been designated by  
36  
37 Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is  
38  
39 being filed under seal.

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41 32. Attached hereto as Exhibit EE is a true and correct copy of Exhibit 36 to the  
42  
43 Hoang Dep., Vol. I (Bates numbered IMDb 001259-60). This document has been designated by  
44  
45 Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is  
46  
47 being filed under seal.

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49 33. Attached hereto as Exhibit FF is a true and correct copy of Exhibit 37 to the  
50  
51 Hoang Dep., Vol. I (“Updating Information for Junie Hoang,” Bates numbered HOANG

000001). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

34. Attached hereto as Exhibit GG is a true and correct copy of Exhibit 38 to the Hoang Dep., Vol. I (Bates numbered HOANG 000021-23). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

35. Attached hereto as Exhibit HH is a true and correct copy of Exhibit 39 to the Hoang Dep., Vol. I (Bates numbered HOANG 000024-26). This document has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

36. Attached hereto as Exhibit II is a true and correct copy of Exhibit 40 to the Hoang Dep., Vol. I (Hoang's 2008 tax information, Bates numbered HOANG 000031-39). This document has been designated by Hoang as Highly Confidential—Attorneys' Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

37. Attached hereto as Exhibit JJ is a true and correct copy of Exhibit 41 to the Hoang Dep., Vol. I (Hoang's 2009 tax information, Bates numbered HOANG 000040-44). This document has been designated by Hoang as Highly Confidential—Attorneys' Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

38. Attached hereto as Exhibit KK is a true and correct copy of Exhibit 42 to the Hoang Dep., Vol. I (Hoang's 2010 tax information, Bates numbered HOANG 000045-55). This document has been designated by Hoang as Highly Confidential—Attorneys' Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

39. Attached hereto as Exhibit LL is a true and correct copy of Exhibit 43 to the Hoang Dep., Vol. I (Hoang's 2011 tax information, Bates numbered HOANG 000056-63). This document has been designated by Hoang as Highly Confidential—Attorneys' Eyes Only pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.

1           40. Attached hereto as Exhibit MM is a true and correct copy of portions of the  
 2 transcript of the deposition of Huong Hoang taken on August 7, 2012 in the above-captioned  
 3 matter ("Hoang Dep., Vol. II"). Relevant portions of the transcript have been highlighted in grey.  
 4 Further, the transcript has been redacted in accordance with CR 5.1. Portions of the transcript  
 5 that have been designated by Hoang as Confidential or Highly Confidential—Attorneys' Eyes  
 6 Only pursuant to the Stipulated Protective Order, Dkt. No. 58, have been redacted from the  
 7 publicly-filed version of this declaration. A non-redacted version is being filed under seal.  
 8  
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10           41. Attached hereto as Exhibit NN is a true and correct copy of Exhibit 48 to the  
 11 Hoang Dep., Vol. II (Actors Access document Bates numbered HOANG 000170-85). This  
 12 document has been designated by Hoang as Confidential pursuant to the Stipulated Protective  
 13 Order, Dkt. No. 58, and therefore is being filed under seal. Due to the illegible nature of this  
 14 copy, an electronic version of HOANG 000170-85 is provided on a disk as Exhibit FFF. *See*  
 15 Paragraph 60.  
 16  
 17

18           42. Attached hereto as Exhibit OO is a true and correct copy of Exhibit 50 to the  
 19 Hoang Dep., Vol. II (Casting Frontier document Bates numbered HOANG 000565-88). This  
 20 document has been designated by Hoang as Confidential pursuant to the Stipulated Protective  
 21 Order, Dkt. No. 58, and therefore is being filed under seal. Due to the illegible nature of this  
 22 copy, an electronic version of HOANG 000565-88 is provided on a disk as Exhibit FFF. *See*  
 23 Paragraph 60.  
 24  
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26           43. Attached hereto as Exhibit PP is a true and correct copy of Exhibit 51 to the  
 27 Hoang Dep., Vol. II (Casting Frontier document Bates numbered HOANG 000186). This  
 28 document has been designated by Hoang as Confidential pursuant to the Stipulated Protective  
 29 Order, Dkt. No. 58, and therefore is being filed under seal. Due to the illegible nature of this  
 30 copy, an electronic version of HOANG 000186 is provided on a disk as Exhibit FFF. *See*  
 31 Paragraph 60.  
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1           44. Attached hereto as Exhibit QQ is a true and correct copy of Exhibit 52 to the  
2  
3 Hoang Dep., Vol. II (Casting Networks Incorporated document Bates numbered HOANG  
4 000589-94). This document has been designated by Hoang as Confidential pursuant to the  
5  
6 Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal. Due to the  
7  
8 illegible nature of this copy, an electronic version of HOANG 000589-94 is provided on a disk  
9  
10 as Exhibit FFF. *See* Paragraph 60.  
11

12           45. Attached hereto as Exhibit RR is a true and correct copy of Exhibit 53 to the  
13  
14 Hoang Dep., Vol. II (Casting Networks Incorporated document Bates numbered HOANG  
15  
16 000595-600). This document has been designated by Hoang as Confidential pursuant to the  
17  
18 Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal. Due to the  
19  
20 illegible nature of this copy, an electronic version of HOANG 000595-600 is provided on a disk  
21  
22 as Exhibit FFF. *See* Paragraph 60.  
23

24           46. Attached hereto as Exhibit SS is a true and correct copy of Exhibit 54 to the  
25  
26 Hoang Dep., Vol. II (Now Casting document Bates numbered HOANG 000601-62). This  
27  
28 document has been designated by Hoang as Confidential pursuant to the Stipulated Protective  
29  
30 Order, Dkt. No. 58, and therefore is being filed under seal. Due to the illegible nature of this  
31  
32 copy, an electronic version of HOANG 000601-62 is provided on a disk as Exhibit FFF. *See*  
33  
34 Paragraph 60.  
35

36           47. Attached hereto as Exhibit TT is a true and correct copy of Exhibit 55 to the  
37  
38 Hoang Dep., Vol. II (Now Casting document Bates numbered HOANG 000187). This document  
39  
40 has been designated by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt.  
41  
42 No. 58, and therefore is being filed under seal. Due to the illegible nature of this copy, an  
43  
44 electronic version of HOANG 000187 is provided on a disk as Exhibit FFF. *See* Paragraph 60.  
45  
46

47           48. Attached hereto as Exhibit UU is a true and correct copy of Exhibit 56 to the  
48  
49 Hoang Dep., Vol. II (Plaintiff's Objections and Responses to Defendants' Second Set of  
50  
51 Interrogatories and Requests for Production to Plaintiff). This document has been designated by

1 Hoang as Confidential or Highly Confidential—Attorneys’ Eyes Only pursuant to the Stipulated  
 2 Protective Order, Dkt. No. 58, and therefore is being filed under seal.  
 3

4 49. Attached hereto as Exhibit VV is a true and correct copy of Exhibit 57 to the  
 5 Hoang Dep., Vol. II (Plaintiff’s Amended Objections and Responses to Defendants’ Second Set  
 6 of Interrogatories and Requests for Production to Plaintiff). This document has been designated  
 7 by Hoang as Highly Confidential—Attorneys’ Eyes Only pursuant to the Stipulated Protective  
 8 Order, Dkt. No. 58, and therefore is being filed under seal.  
 9

10 50. Attached hereto as Exhibit WW is a true and correct copy of Exhibit 58 to the  
 11 Hoang Dep., Vol. I (Bates numbered HOANG 000167-69). This document has been designated  
 12 by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore  
 13 is being filed under seal.  
 14

15 51. Attached hereto as Exhibit XX is a true and correct copy of Exhibit 59 to the  
 16 Hoang Dep., Vol. II (Bates numbered HOANG 000164-66). This document has been designated  
 17 by Hoang as Confidential pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore  
 18 is being filed under seal.  
 19

20 52. Attached hereto as Exhibit YY is a true and correct copy of the IMDbPro  
 21 Subscriber Agreement, captured from [www.imdb.com](http://www.imdb.com) on November 9, 2011.  
 22

23 53. Attached hereto as Exhibit ZZ is a true and correct copy of the IMDbPro Privacy  
 24 Policy, captured from [www.imdb.com](http://www.imdb.com) on November 9, 2011.  
 25

26 54. Attached hereto as Exhibit AAA is a true and correct copy of a screenshot of  
 27 IMDb’s “Submission Guides: Biographical Information,” captured from [http://www.imdb.com/](http://www.imdb.com/updates/guide/bio_all_guides)  
 28 [updates/guide/bio\\_all\\_guides](http://www.imdb.com/updates/guide/bio_all_guides) (IMDb 000058-62).  
 29

30 55. Attached hereto as Exhibit BBB is a true and correct copy of correspondence  
 31 from John W. Dozier, Jr. to L. Michelle Wilson, dated May 4, 2011 (Bates numbered IMDb  
 32 000065).  
 33

1           56. Attached hereto as Exhibit CCC is a true and correct copy of correspondence  
2  
3 from David A. Zapolsky to John W. Dozier, Jr., dated May 10, 2011 (Bates numbered IMDb  
4  
5 000066).

6  
7           57. Attached hereto as Exhibit DDD is a true and correct copy of portions of the  
8  
9 transcript of the deposition of Joe Kolkowitz taken on August 7, 2012 in the above-captioned  
10  
11 matter. Relevant portions of the transcript have been highlighted in grey. Further, the transcript  
12  
13 has been redacted in accordance with CR 5.1. Portions of the transcript that have been designated  
14  
15 by Hoang as Confidential or Highly Confidential—Attorneys’ Eyes Only pursuant to the  
16  
17 Stipulated Protective Order, Dkt. No. 58, have been redacted from the publicly-filed version of  
18  
19 this declaration. A non-redacted version is being filed under seal.

20  
21           58. Attached hereto as Exhibit EEE is a true and correct copy of Plaintiff Huong  
22  
23 Hoang’s Rule 26(a)(1) Initial Disclosures.

24  
25           59. Attached hereto as Exhibit FFF is a true and correct copy of documents Bates  
26  
27 numbered HOANG 000200-564. This document has been designated by Hoang as Confidential  
28  
29 pursuant to the Stipulated Protective Order, Dkt. No. 58, and therefore is being filed under seal.  
30  
31 Further, due to the volume of this document (365 pages), Exhibit FFF will be filed in CD form  
32  
33 with the Clerk’s Office rather than electronically.

34  
35           60. Attached hereto as Exhibit GGG is a true and correct copy of a disk containing  
36  
37 documents Bates numbered HOANG 000170-85, HOANG 000565-88, HOANG 000186,  
38  
39 HOANG 000589-94, HOANG 000595-600, HOANG 000601-62, and HOANG 000187. This  
40  
41 document has been designated by Hoang as Confidential pursuant to the Stipulated Protective  
42  
43 Order, Dkt. No. 58, and therefore is being filed under seal. These documents are attached in the  
44  
45 hard-copy format used in depositions as Exhibits NN, OO, PP, QQ, RR, SS, and TT,  
46  
47 respectively.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2  
3 true and correct.  
4

5  
6  
7 DATED: November 29, 2012

By: /s/ Breena M. Roos  
Breena M. Roos

**CERTIFICATE OF SERVICE**

I certify that on November 29, 2012, I electronically filed the foregoing  
**DECLARATION OF BREENA M. ROOS** with the Clerk of the Court using the CM/ECF  
 system, which will send notification of such filing to the following attorneys of record

|                             |                                     |   |
|-----------------------------|-------------------------------------|---|
| <b>Derek Alan Newman</b>    | <input type="checkbox"/>            | Via hand delivery                         |
| <b>Keith Scully</b>         | <input type="checkbox"/>            | Via U.S. Mail, 1st Class, Postage Prepaid |
| <b>Charlotte Williams</b>   | <input type="checkbox"/>            | Via Overnight Delivery                    |
| Newman Du Wors LLP          | <input type="checkbox"/>            | Via Facsimile                             |
| 1201 Third Avenue, Ste 1600 | <input checked="" type="checkbox"/> | Via Email                                 |
| Seattle, WA 98              | <input checked="" type="checkbox"/> | Via ECF _____                             |

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 29th day of November, 2011.

s/ Breena M. Roos  
 Charles C. Sipos, WSBA No. 32825  
 Breena M. Roos, WSBA No. 34501  
 Ashley Locke, WSBA No. 40521  
**Perkins Coie LLP**  
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 Seattle, WA 98101-3099  
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 E-mail: broos@perkinscoie.com  
 E-mail: alocke@perkinscoie.com  
 Attorneys for Defendants Amazon.com, Inc.  
 and IMDb.com, Inc.